

Amiad Kushner
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*Attorneys for Lior Dagan as Foreign Representative of
Michael David Greenfield (a.k.a. Michael Ben-Ari)*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

MICHAEL DAVID GREENFIELD
a.k.a. MICHAEL BEN-ARI

Debtor in a Foreign Proceeding.

Chapter 15

Case No. 21-11411 (SCC)

**DECLARATION OF AMIAD KUSHNER IN SUPPORT OF MOTION OF LIOR
DAGAN, THE FOREIGN REPRESENTATIVE, FOR ENTRY OF AN ORDER
AFFIRMING HIS AUTHORITY TO REALIZE AND TAKE CONTROL OF CERTAIN
IDENTIFIED ASSETS OF THE DEBTOR AND ASSETS OF THE DEBTOR THAT MAY
BE IDENTIFIED IN THE FUTURE WITHIN THE UNITED STATES AND
REPATRIATE THOSE ASSETS TO ISRAEL**

I, Amiad Kushner, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am a Partner at the law firm of Seiden Law Group LLP, which is counsel of record for Lior Dagan as Foreign Representative (“Foreign Representative”) of Michael David Greenfield (the “Debtor”) in the above-captioned matter. I am admitted to practice before the courts of the State of New York.

2. I make this declaration in support of the Foreign Representative’s above-titled motion for certain discretionary relief pursuant to 11 U.S.C. § 1521(a)(5) and 1521(b) filed concurrently herewith.

3. I make this declaration based on my own personal knowledge, and, if called upon to do so, could and would testify competently thereto.

4. Seiden Law Group LLP, as attorneys for the Foreign Representative, maintains a New York escrow account for the assets of the Debtor that have been collected in the United States to date (“Escrow Account”). The table below reflects all of the U.S.-based assets of the Debtor which the Foreign Representative has identified and which are now held in the Escrow Account (“Identified Assets”):

Prior Asset Custodian	Title of Account	Funds	Funds Reserved for Department of Justice
LPL Financial	Michael David Greenfield – Multiple Accounts	\$119,754.74	Reserved
Bank of America	Michael David Greenfield	\$416,047.11	Reserved
Bank of America	Michael David Greenfield	\$0.58	Not Reserved
Bank of America	EGFE USA LLC ¹	\$41,119.45	Reserved
Prudent Group	EGFE Hungary KFT ²	\$348,266	Not Reserved

5. Attached hereto is a true and correct copy of the following document:

Exhibit A: The original Hebrew and certified-English translated order issued by the District Court in Tel Aviv-Yafo dated January 26, 2022, authorizing the Foreign Representative to repatriate to Israel all U.S.-based assets of the Debtor.

I declare under penalty of perjury that the foregoing is, to the best of my knowledge and belief, true and correct.

¹ The Foreign Representative has replaced the Debtor as owner of EGFE USA LLC.

² The Foreign Representative has replaced the Debtor as owner of EGFE Hungary KFT.

Dated: March 9, 2022
New York, New York

SEIDEN LAW GROUP LLP

/s/ Amiad Kushner

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